

THE HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROCKFISH, INC., a Washington Corporation,

Plaintiff,

v.

UNIDENTIFIED WRECKED AND
ABANDONED VESSEL, her engines, boilers,
apparel, tackle, equipment, appurtenances and
cargo, *in rem*,

Defendant.

IN ADMIRALTY

CASE NO.: 22-cv-1659-JLR

**[PROPOSED] ORDER
GRANTING PLAINTIFF'S
MOTION TO EXTEND
EXCLUSIVE RIGHT TO
SALVAGE VESSEL AND
INJUNCTION AGAINST
COMPETING SALVAGE
OPERATIONS**

This matter having come before the Court on Plaintiff's Motion to Extend Exclusive Right to Salvage Vessel and Injunction Against Competing Salvage Operations, and the Court having considered the motion and being fully advised, now, therefore, it is hereby:

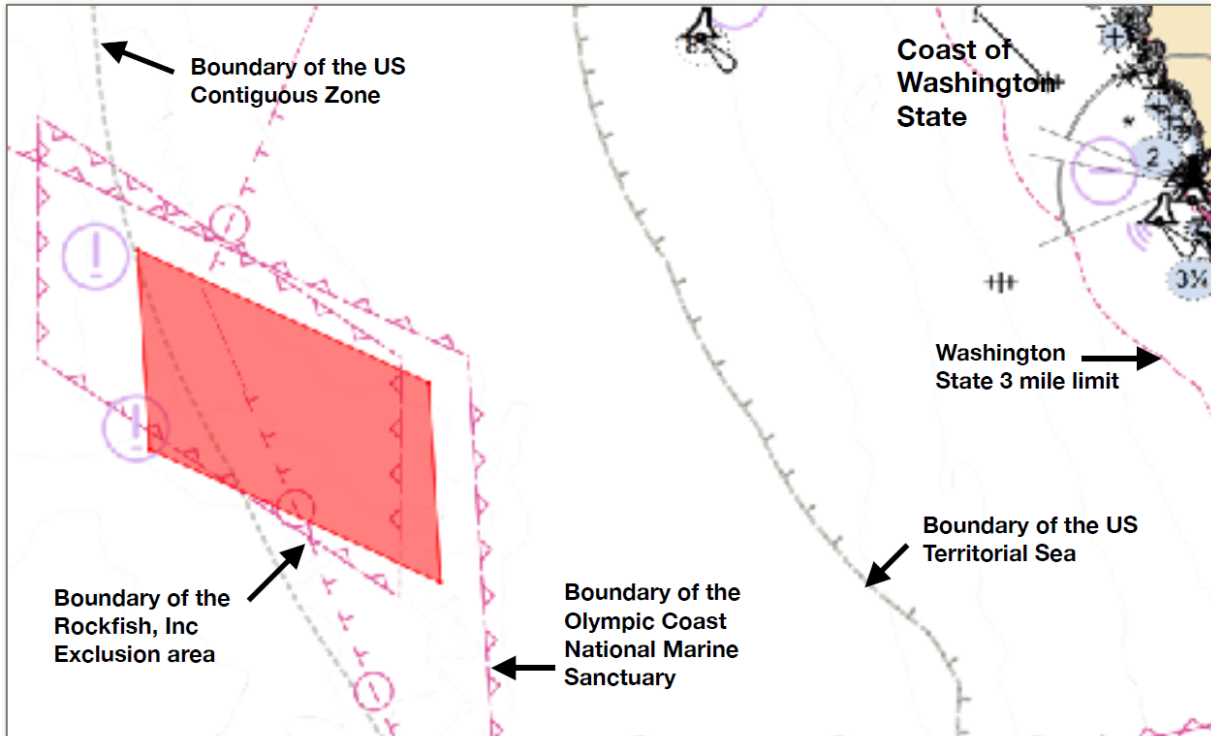
ORDERED that plaintiff's motion is **GRANTED**; and

IT IS FURTHER ORDERED that Plaintiff is hereby granted the exclusive right to salvage the Defendant Unidentified Wrecked and Abandoned Vessel (the "Vessel"). Unless otherwise authorized by the Court, all other salvors are enjoined from engaging in salvage operations within the polygon bounded by the following coordinates (WGS 84 datum):

- **NW Corner of polygon:** 47.8781 latitude -125.2987 longitude
- **NE Corner of polygon:** 47.8229 latitude -125.1179 longitude

- **SE Corner of polygon:** 47.7398 latitude -125.1100 longitude
- **SW Corner of polygon:** 47.7949 latitude -125.2912 longitude

A graphic depiction of this polygon follows:



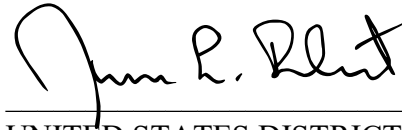
Unless extended by the Court, Plaintiff's exclusive right to salvage the Vessel and the above-described injunction against competing salvage operations shall lapse on April 21, 2025. Plaintiff is permitted to seek extension of its exclusive salvage right and the injunction by motion. In order to obtain such extension, Plaintiff must demonstrate its salvage efforts will be undertaken with due diligence, are ongoing, and clothed with some prospect of success, consistent with the principles set forth in Moyer v. Wrecked & Abandoned Vessel, known as Andrea Doria, 836 F. Supp. 1099, 1106 (D.N.J. 1993).

\\

\\

\\

1 DATED this 21st day of December, 2023.

2
3
4 

5 UNITED STATES DISTRICT COURT JUDGE

6
7 **Presented by:**
8 NICOLL BLACK & FEIG PLLC

9 /s/ Jeremy B. Jones

10 Jeremy B. Jones, WSBA No. 44138

11 *Attorneys for Plaintiff*